

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Cox Airparts LLC, a Kansas limited
liability company;

Plaintiff,

v.

Kevin Brown, and Jane Doe Brown
husband and wife, Michael and Andrea
Polve, husband and wife,
MJP Services, LLC, an Arizona limited
liability company;

Defendants.

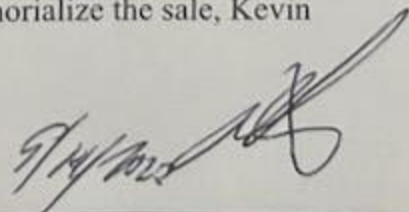
Case No.: CV-23-1466-PHX-SMB

**DECLARATION OF DEVORAH
RANEY IN SUPPORT OF
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

(Jury Trial Demanded)

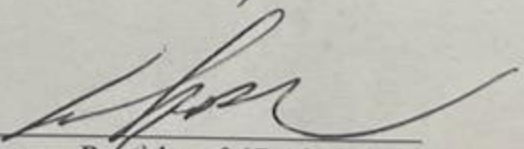
I, Devorah Raney, make the following declarations in support of the 1st Amended
Complaint in the above captioned case:

1. I am over the age of 18 and competent to make this declaration.
2. I am the president of 24/7 Air Charter Services, LLC, of Pompano Beach
Florida ("247 Air Services").
3. 247 Air Services provides parts, and part repair services, for civilian and
military fixed-wing and rotor-wing aircraft to airlines, end users, MROs,
OEMs, brokers with exclusive mandates, and government agencies.
4. In October 2022, Kevin Brown offered to sell, and 247 Air Services agreed to
purchase three hydraulic servo actuators for helicopter use that Kevin Brown
promised would be torn down, overhauled, and shipped to 247 Air Services
with a "fresh dual release 8130 and EASA." To memorialize the sale, Kevin

9/14/2023 

Brown sent 247 Services invoice no. 10244 for three actuators. **Exhibit A1** is a true and accurate copy of invoice no. 10244 from Arizona Aircraft Accessories, LLC.

5. As down payment for the parts and services, 247 Air Services wired \$5000 to Kevin Brown on October 28, 2022. **Exhibit A2** is a true and accurate copy of the wire receipt to Kevin Brown's account.
6. Kevin Brown then asked for the remaining amount to be sent to a different account, with a beneficiary of "MJP Services, LLC", with account number XXXXX7663.
7. On November 2, 2022, 247 Air Services wired \$30000 to MJP Services LLC, account number XXXXX7663. **Exhibit A3** is a true and accurate copy of the wire receipt for payment of \$30000 to MJP Services LLC.
8. 247 Air Services never received the parts on Purchase Order for which we demanded delivery or refunds, but Kevin Brown refused to honor the terms of the purchase orders and despite promising a refund, never refunded our payments.
9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. This declaration is executed in Pompano Beach Florida on the date indicated below.


Devorah Raney, President 247 Air Services

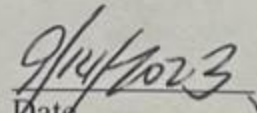

Date

Exhibit A1

INVOICE

Arizona Aircraft Accessories
566 E Germann Rd
Gilbert Az 85297
C: 480-620-4946

BILL TO
247 Air Services
17 SE 24th Avenue
Pompano Beach FL 33062

INVOICE # 10244
INVOICE DATE 10/21/2022

DESCRIPTION	AMOUNT
PIN 70400-06641-117 Actuator Overhauled with tear down report, work order report and fresh dual release 8130 and EASA Qty 1	19,500.00
PIN 70400-06641-117 Actuator Overhauled with tear down report, work order report and fresh dual release 8130 and EASA Qty 1 \$17,000	17,000.00
TOTAL	\$36,500.00
Paid Amount	5,000.00
BALANCE DUE	\$31,500.00

Ref. 10244
(3) P/A
Units 70400-06641-117
At 5,000.00
Actuator

Thank you

TERMS & CONDITIONS
Wire Amt. 30,000 -

Exhibit A2

19545914554

SPECIAL INSTRUCTIONS DEP. FOR
(2)7040-06641-117
ACTUATORS

SOURCE ACCOUNT: [REDACTED] CHECKING (FIMP: 016)
AMOUNT OF WIRE: 5000.00 BANK FEE: 55.00
DATE OF REQUEST: 10/28/22 CITIBANK REF NUM: 3010096234

BANKER: P2063500ISLAS, MATIAS

Oct 28, 2022 4:35:55 PM

Exhibit A3

INSTRUCTIONS		REF 10244 P-N 7040006841117 (3) UNITS ACTUATOR PD 5,000.00	
SOURCE ACCOUNT:		Redacted Personal ID	CHECKING (FIMP: 016)
AMOUNT OF WIRE:		30000.00	BANK FEE: 55.00
DATE OF REQUEST:		11/02/22	CITIBANK REF NUM: 3060413530
BANKER: P4464633VARGAS, ANA			
Thank you!			
BR: 00033		DOMESTIC MONEY TRANSFER	
11/02/22		BUS: 016	
		CITIBANK REFERENCE NUMBER: 3060413530	
SENDER INFORMATION		24/7 AIR CHARTER SERVICES, LIMITED 1440 SW 28TH AVENUE POMPANO BEACH FL USA 33069	
		1 9543661985	
BENEFICIARY INFORMATION		MJP SERVICES LLC	
		4806204946 ACCOUNT: Redacted /663	
BENEFICIARY BANK INFORMATION		ABA#: 021000021 JPMORGAN CHASE BANK, NA 270 PARK AVE	